

IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
FILED

APR 21 2021

DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

LASHETICA MCQUIETOR,

Plaintiff,

vs.

CHAMPION NATIONAL SECURITY,
INC., a Foreign Corporation; and
WAL-MART STORES EAST, L.P., a
Foreign Limited Partnership,

Defendants.

Case No. **2021-01141**

WILLIAM MUSSEMAN

PETITION FOR DAMAGES

COMES NOW the Plaintiff, LASHETICA MCQUIETOR, and for her cause of action against the Defendants, CHAMPION NATIONAL SECURITY, INC. and WAL-MART STORES EAST, L.P. (hereinafter referred to as WAL-MART), alleges and states as follows:

1. That the Plaintiff is a resident of Tulsa County, State of Oklahoma; that Defendant, CHAMPION NATIONAL SECURITY, INC., is a foreign corporation licensed and doing business in the State of Oklahoma; and, that Defendant, WALMART, is a foreign limited partnership doing business in the State of Oklahoma. That the complaint alleged herein occurred in Tulsa County, State of Oklahoma, and that this Court has jurisdiction over the parties and subject matter herein.

FIRST CAUSE OF ACTION

2. On July 31, 2020, while Plaintiff was a business invitee of the Defendant, WAL-MART, at its location of 2019 East 81st Street, Tulsa, Oklahoma, she was wrongfully, unlawfully, forcibly and negligently detained by handcuffing her and refusing to allow her to use the restroom for approximately four hours by agents, servants or employees of the Defendant, CHAMPION NATIONAL SECURITY, INC., as security for WAL-MART.

3. The Plaintiff is informed and believes that at all times relative hereto, and specifically at the time of the incident from which this cause of action arose, agents, servants or employees of the Defendant, CHAMPION NATIONAL SECURITY, INC., were not acting in an individual capacity and that said agents, servants or employees of the Defendant, CHAMPION NATIONAL SECURITY, INC. were the agents, servants, and employees of Defendant, WAL-MART, performing said acts for the Defendant, WAL-MART, within the scope and course of their agency, servitude, and employment; carrying on and furthering the business interests of the Defendant, WAL-MART; and therefore, any negligence of the Defendant, CHAMPION NATIONAL SECURITY, INC., should also be directly imputed to the Defendant, WAL-MART.

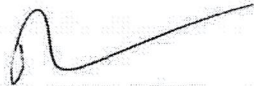
4. As a result of Defendants' actions, Plaintiff, LASHETICA MCQUIETOR, has suffered damages including, but not limited to, physical injury, mental and emotional distress, as well as loss to Plaintiff's reputation.

5. When injured, Plaintiff, LASHETICA MCQUIETOR, was 50 years old with a life expectancy of 31.5 more years according to the National Vital Statistics Report, May 7, 2019.

WHEREFORE, Plaintiff, LASHETICA MCQUIETOR, prays for judgment against the Defendants, CHAMPION NATIONAL SECURITY, INC. and WAL-MART STORES EAST, L.P., and each of them, in an amount in excess of the amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code together with the costs of this action.

Respectfully submitted,

By



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ATTORNEYS LIEN CLAIMED

Attorney for Plaintiff